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Problem Definition

The boundaries of land use and resource management programs have traditionally been established based on pollution sources, resources at risk, jurisdiction or land ownership. Significant improvements have been achieved on point sources of pollution but many underlying nonpoint pollution and habitat issues remain. Watersheds are a natural scale for resource planning and analysis because the watershed encompasses the entire hydrologic regime. Water quantity, water quality and many habitat issues can be analyzed and managed in a watershed context. Characterizing issues on a watershed scale also encourages planning participants to think across the lines of traditional jurisdiction and interest. Watersheds are planning units that people can understand and work with.

Program

However, planning at the watershed scale provides unique challenges. Characterizing watershed health takes time and money and agreement from diverse interests on the data and methods. Watersheds can be identified as stream basins, river basins or groups of river basins. The size of the watershed unit strongly influences the cost and detail of data collection as well as the methods for

working with constituents. Implementing solutions that will contribute to the long-term health of the watershed requires the participation and ongoing support of governments, businesses and citizens—groups that aren't used to working together. Working with such diverse clusters of governments and interest groups requires a high level of skill and different approaches from when one government only is in charge. Key ingredients in watershed approaches include technical expertise, long-term cooperative involvement of all levels of government and a variety of interested parties, and adequate financing.

The success of watershed planning efforts will depend in large measure on local land-use design and capital facilities investments. Cities and counties control about 65 percent of total land area and almost all developed land in the state. Cities and counties determine the type, location and quality of development and what infrastructure is needed to support development. They also determine what needs to be done to minimize the environmental impacts of development.

Another complication to watershed planning in the Puget Sound basin is the succession of different approaches to watershed planning since the 1970s. Beginning with sewage basin planning, watershed

What does "shall" mean?

The Action Team has determined that the actions in this plan are needed to protect and restore Puget Sound. Consistent with the importance of these actions, this plan says that appropriate implementers "shall" perform the actions. However, implementation of many of these actions is a long-term process. The Action Team's work plans will identify the actions that need to be taken each biennium to implement this management plan. Implementation of actions in the work plans is subject to the availability of funds and public input into the decision-making processes of implementing entities. When an action is included in a biennial work plan, the Action Team expects that it will be implemented in accordance with the relevant provisions of the Puget Sound management plan, in accordance with Chapter 90.71 RCW.

approaches have been targeted at individual issues or clusters of issues, such as water pollution, habitat, nonpoint pollution and water quantity. Each process used different procedures for data collection, problem identification, public involvement, and implementation. Currently there are a number of watershed approaches at every level of government. Refinements are on the way and there are several efforts to coordinate among watershed planning programs. While it is not necessary to have one watershed approach that suits all purposes, the challenge is to provide a coherent system that maximizes the use of government resources and the energies of the involved public.

Institutional Framework

Since 1987 the Puget Sound Water Quality Management Plan has called for development of watershed action plans. The general approach to planning is described in rules (Chapter 400-12 WAC). Plans are primarily intended to address water quality but other issues, such as habitat, flooding and water quantity could be added. Watershed action plans are locally led and developed through a cooperative project of governments and interests in each watershed. The Department of Ecology provides program oversight, technical assistance and funding through the Centennial Clean Water Fund. To date, 44 watershed action plans initiated covering about a quarter of the Puget Sound basin. WAC-400-12 planning is the focus of the watershed elements in this management plan.

In addition to WAC 400-12 plans, several other watershed planning approaches are being used or developed in the basin. Table 1 compares their different purposes.

The 1998 Watershed Planning Act (Chapter 90.82 RCW) is often called the "2514" process after its bill number (HB2514). The Act provides guidance and funding for watershed plans primarily intended to address water quantity but the planning entities may choose to include water quality and habitat issues. As of August 2000, plans were being prepared in the Puget Sound basin covering 16 Water Resource Inventory Areas. Seven of these were committed to addressing water quality and habitat issues, seven had not yet decided their scope and two were only addressing water quantity. Ecology provides guidance coordination and funding for development of 2514 plans.

In 2000, Ecology published Washington's Water

Table 1. Approaches to Watershed Planning							
Watershed Approach (Agency Lead) Recovery	<u>Purp</u> Habitat	ose (P-Pri Water Quantity	Water	ESA Fish			
WAC 400-12 Watershed Action Plans (Action Team)	0		Р				
Total Maximum Daily Loads (Ecology)			Р				
Salmon Recovery Act Limiting Factors Analysis (Conservation Commission)				Р			
Forestland Watershed Analysis (Natural Resources)	Р		Р	Р			
Watershed Planning Act (Ecology)	0	Р	0	0			
Tri-County (King, Pierce, Snohomish)	Р		Р	Р			

Quality Management Plan to Control Nonpoint Source Pollution in April 2000. This plan describes a Unified Watershed Assessment (UWA) process for targeting use of federal funding provided under Section 319 of the federal Clean water Act. The UWA is intended to meet requirements of the federal Clean Water Action Plan. Under the UWA, the state evaluates the relative impairment of Water Resource Inventory Areas (WRIAs) according to water flow and quality, public health, and the status of fish resources. The state uses a combination of watershed restoration action strategies and knowledge of existing resources to coordinate efforts within watersheds.

The federal Clean Water Act requires Ecology to prepare total maximum daily load (TMDL) plans for water bodies that don't meet state water quality standards. These plans set total maximum limits on point and nonpoint source pollutants that can be discharged to each water body without exceeding state water quality standards. Currently, 115 water bodies in the Puget Sound basin are included on the Clean Water Act 303(d) list as not meeting water quality standards. Ecology will work with communities to develop plans to address these problems through a cooperative state-local planning effort. Most implementation will be the responsibility of local entities.

The 1998 Salmon Recovery Act calls for an analysis of watersheds where salmon are threatened. The analysis identifies biological, water quali-

ty, habitat and water quantity factors that limit salmon production. The state Conservation Commission provides the technical analysis. Local watershed committees evaluate the information and identify potential habitat restoration projects and funding sources.

Watershed analysis is used by Timber, Fish and Wildlife (TFW) cooperators to develop "prescriptions" for protecting and restoring forest resources. Interdisciplinary teams of certified state, tribal or private experts conduct this analysis. Forest practices and other land uses are evaluated in watersheds ranging from 10,000 to 50,000 acres. The U.S. Forest Service also conducts watershed-based analyses and planning for federal forestlands in the basin.

Cities and counties will carry out many of the decisions that come out of the watershed planning efforts. Their comprehensive plans, capital facilities plans and development regulations will be keys to implementation. The Growth Management Act provides the framework for this effort. The State Environmental Policy Act (SEPA) and the Shoreline Management Act (SMA) provide goals and steps that also will assist in carrying out watershed plans.

In the year 2000, new guidance for watershed planning was developed in response to the listings of salmon and other species in the Puget Sound basin. The "Tri-County" group of Snohomish, Pierce and King Counties is developing a watershed approach to guide salmon restoration. The Governor's Salmon Team is developing statewide guidance for watershed planning designed to protect and restore salmon.

Program Goal

All watersheds within the Puget Sound basin counties shall implement local watershed plans that result in reduction and prevention of nonpoint pollution to Puget Sound.

Program Strategy

The strategy for achieving this goal is to provide technical and financial assistance and incentives for local communities and governments both to support development of new watershed plans and to support the implementation of completed watershed plans.

WP-1. Ranking for Watershed Action Plans

Note: In the late 1980s and early 1990s, all counties in the Puget Sound basin ranked their watersheds in priority order for development of watershed action plans. Since that time, other watershed planning approaches have been developed. In lieu of developing watershed action plans under 400-12 WAC, local governments may address these issues through other watershed processes, such as "2514" watershed planning.

Watershed action plans shall be developed on an ongoing basis in the order that watersheds appear on each county's ranked list. A county may develop several plans simultaneously for a group of watersheds with similar rural or urban land uses. Ecology shall work with counties not actively participating in the watershed planning program to identify reasons they are not participating and to develop an appropriate strategy for addressing concerns about nonpoint source pollution.

The need to re-rank watersheds shall be reviewed at least every five years, and more frequently if a significant change occurs, as defined in Chapter 400-12 WAC, or if a jurisdiction is ready to proceed with planning. The county may develop a process for conducting the re-ranking that meets local needs, in accordance with the ranking criteria in this element and the public involvement policy in the *Puget Sound Management Plan*. If changes are made in the county's ranking of watersheds, a summary of the changes and a brief rationale shall be prepared and submitted to the Department of Ecology.

Proposals to the Centennial Clean Water Fund (CCWF) for the development of watershed action plans according to Chapter 400-12 WAC shall be made in the order in which watersheds appear on each county's ranked list. When a county chooses to plan in several watersheds at once, at least one of the watersheds shall be next on the ranked list. Once a completed watershed plan has been approved by Ecology, additional CCWF projects addressing nonpoint pollution in that watershed must be consistent with the approved watershed action plan. In each round of funding, Ecology shall consider proposals for projects in lower-ranked watersheds within a county, based on their merit, if funds are available after consideration of proposals in higher-ranked watersheds within that county. Ecology shall also consider funding proposals for projects to reduce nonpoint sources of pollution or restore streams from watershed action plans not yet completed under Chapter 400-12 WAC.

Ranking Criteria

Counties shall use the following criteria for reviewing the need to re-rank watersheds:

- a. The watershed has a beneficial use, such as recreational or commercial shellfish beds, fish habitat, or drinking water that is impaired or threatened by pollution from nonpoint sources.
- b. The watershed has a likelihood of intensified land or water use, including a likelihood of being developed and/or logged, in the next 10 years.
- c. Environmental factors, such as soil, slope and precipitation on land and/or limited flushing in the Sound, increase the probability of future water quality or habitat degradation.
- d. The watershed produces more contaminants, or causes greater harm to a beneficial use, than other watersheds.
- e. Programs to control nonpoint pollution sources in the watershed are likely to succeed in protecting water quality in Puget Sound as evidenced by: local community and political support; programs already under way; existing institutional arrangements for interjurisdictional cooperation such as the Hood Canal Coordinating Council; integration with comprehensive planning under the Growth Management Act; the federal forest plan and other major implementation activities; or other factors.

Target Date for WP-1: Development and implementation of watershed action plans is ongoing.

WP-2. Guidance for Watershed Action Plans

WP-2.1. The Nonpoint Rule

The purpose of the nonpoint rule (Chapter 400-12 WAC) is to establish a process to identify and rank watersheds in the Puget Sound basin and to develop action plans to prevent nonpoint source pollution, enhance water quality and protect beneficial uses of watersheds.

The Action Team shall periodically review and revise the nonpoint rule and keep a copy of the rule on the Action Team's website. The Action Team shall provide assistance to Ecology as necessary in interpreting the nonpoint rule.

Target Date for WP-2.1: Action Team shall revise the nonpoint rule as needed.

WP-2.2. Contents of Watershed Action Plans

A watershed action plan shall include a watershed characterization, a problem definition, a statement of goals and objectives, pollution control strategies, and an implementation strategy, including a schedule and costs for the actions, a financing strategy and a monitoring program.

The watershed characterization shall include:

- a description of the biological conditions, habitat, and physical characteristics of the environment;
- information on land-use and population trends;
- c. a water quality assessment;
- d. maps showing the action plan boundaries; wetlands, shellfish beds and other critical areas, waterways and water bodies; and jurisdictional boundaries; and
- e. a discussion of existing water quality and related programs in the area.

The goals of watershed action plans shall include meeting water quality, shellfish and other appropriate standards in priority watersheds. The objectives of watershed action plans shall include reopening shellfish beds, preventing further closures of shellfish beds, protecting fish habitat, protecting wetlands, riparian zones and nearshore habitat, and achieving other objectives appropriate to each watershed.

Watershed action plans shall address nonpoint pollution, and effects on habitat, as applicable, from agricultural practices, on-site sewage systems, stormwater, forest practices and any other potentially significant nonpoint sources in the watershed. Watershed committees shall also explore strategies, as needed, for the protection and restoration of wetlands, riparian areas streams and nearshore habitat. The pollution control strategies contained in action plans shall be consistent, as appropriate, with the management measures guidance under the Coastal Zone Act Reauthorization Amendments (CZARA) Section 6217.

The nonpoint rule (Chapter 400-12 WAC) shall permit watershed management committees to select regulatory, voluntary and/or educational approaches for addressing nonpoint pollution in the watershed. If regulatory programs are chosen, adequate enforcement must be provided; and if

educational programs are chosen, agencies and/or individuals with expertise in education must be involved in program development and implementation. Watershed plans may be organized as appropriate to address the various pollutants of concern and/or their sources in the watershed.

Overall, the strategies to control nonpoint source pollution contained in action plans shall be consistent with the relevant management measures in the CZARA 6217. The action plan implementation strategy shall include the following components:

- A description of the specific actions required of each implementing entity
- b. A schedule with annual milestones;
- c. Estimated costs and a budget;
- d. A long-term local financing strategy;
- The lead agency for coordinating implementation:
- f. A dispute resolution process;
- g. Provisions for public involvement in the preparation and adoption of implementation plans, policies and ordinances; and
- h. The designation of a watershed management council to advise and assist in overseeing implementation.

A process and strategy shall be developed for coordination and/or integration with ongoing local, state, federal or tribal natural resource management, land-use and watershed programs. These include: local comprehensive plans under the Growth Management Act; wetlands and riparian area management and protection programs; local stormwater and highway runoff programs; flood control plans; groundwater management programs; drainage basin plans; the Shoreline Master Program; fisheries and shellfish programs; the federal forest plan initiative; and others as appropriate.

A method shall be described for evaluating the overall effectiveness of the action plan in improving and protecting water quality and habitat, including setting up a long-term monitoring program and a process for annual review.

WP-2.3. Handbook for Watershed Action Plans

The Action Team shall revise and reprint the nonpoint handbook as necessary. The handbook is available from the Action Team. Ecology has produced a report with suggestions for how to conduct watershed planning and a technical guidance manual for 2514 watershed planning.

WP-2.4. Watershed Plan Compilation

Ecology, in cooperation with the Action Team, shall compile strategies for controlling nonpoint source pollution and practices for use by watershed committees in developing future watershed action plans.

WP-3. Development of Watershed Action Plans

When funding becomes available, the appropriate lead agency(ies) is (are) responsible for convening a watershed management committee. If two or more counties share a watershed, the counties may agree on a temporary lead to convene the committee or may jointly convene the committee.

The county is presumed to be the chair for each watershed management committee. However, the committee may designate a city, local health agency, conservation district or other agency if circumstances warrant.

It is the intent of the Action Team that the watershed committee include all entities that have a legitimate role in the development and implementation of a watershed action plan. This includes affected local and tribal governments, special purpose districts, watershed residents, appropriate state and federal agencies (if the watershed includes significant state or federal lands or regulatory role) and other affected parties. Affected parties are those whose beneficial use of water is being impaired, or potentially impaired, by nonpoint pollution and those groups associated with the various sources of nonpoint pollution. Examples of affected parties include agricultural groups, realtors, environmental groups, etc. Additional advisory committees may be established as necessary and agreed upon by the committee members.

The watershed management committee shall be responsible for developing the action plan. The lead agency shall be responsible for setting up the watershed committee, convening meetings, coordinating among local jurisdictions and other agencies, working with planning and implementing agencies in preparation of the plan, compiling and publishing the plan, submitting the plan to the Department of Ecology for approval, and seeking funding opportunities. Lead agencies shall prepare the characterization, prior to convening the committee, for the committee's subsequent review and approval. Watershed management committees are encouraged, but not required, to use consensus in making major decisions relating to the watershed plan.

For the purpose of this program, a planning agency is the agency that prepares reports and makes recommendations, and an implementing agency is the agency that carries out the day-to-day activities of the plan once a county and/or city council adopt it. An agency could be both a planning agency and an implementing agency. In watersheds with two or more counties or cities, there could be several implementing agencies for the same source.

The watershed action planning process shall include public participation. In addition to representation on the watershed committee, the public shall be educated and involved in making decisions through such activities as public meetings and hearings, watershed events and tours, citizen workshops, open houses and newsletters. Watershed committees are encouraged to take advantage of coordination and training opportunities under the Education and Public Involvement Program.

Lead agencies shall initiate the concurrence process as soon as the draft plan is published for public review, and preferably sooner. Each potential planning and implementing entity shall evaluate those provisions of the draft action plan that require the entity's involvement, and provide any comments to the lead agency within 60 days. Within 60 days of publication of the final action plan, each implementing entity shall submit a statement of concurrence to the watershed management committee indicating its intent to adopt implementing policies, ordinances and programs as required, or a statement of non-concurrence, proposing necessary modifications to those sections requiring its involvement.

WP-4. Plan Adoption and Implementation

The Action Team will maintain references to sample watershed plans on the Action Team website. Each watershed action plan submitted to the Ecology for approval shall meet the requirements specified in the nonpoint rule and shall be consistent with the goals and requirements of the *Puget Sound Management Plan:*

- The plan must have been developed by a watershed management committee in accordance with the process described in Chapter 400-12 WAC.
- b. The plan must contain a statement of goals and objectives, a summary of the watershed

- characterization and a problem definition.
- c. The plan must specify a set of measures and actions, consistent as appropriate with the Coastal Zone Act Reauthorization
 Amendments (CZARA) Section 6217 management measures, to be carried out by implementing agencies to address the priority problems with nonpoint pollution in the watershed and to help meet the goals and objectives of the plan.
- d. The plan must include an implementation strategy, budget, local financing strategy and implementation schedule.
- e. The plan must include statements of concurrence from agencies responsible for implementing the recommendations made in the plan.
- f. The plan must include a short- and longterm monitoring strategy, including provisions for annual reviews.
- g. The plan must demonstrate that adequate public involvement and participation occurred during plan development and will be provided for during implementation.

It is the intent of the management plan that watershed plans be developed in such a way that they are adapted to the unique needs of each watershed. Ecology shall have 30 days to approve or disapprove local watershed plans.

Ecology shall approve final action plans that meet the minimum requirements of the Nonpoint Rule and other appropriate grant requirements. If a plan is not approved, the watershed management committee shall revise the plan as necessary and the lead shall negotiate with Ecology for final approval. If the lead agency and Ecology cannot reach agreement on approval, either entity may request review by the Action Team.

WP-5. Program Funding and Incentives

In addition to the following elements, new funding sources for managing nonpoint pollution may be identified or proposed as opportunities arise.

WP-5.1. Nonpoint Watershed Grants

Ecology shall administer programs for disbursing grant funds from the CCWF, the 319 Management Program and other sources to lead agencies and other implementing entities for preparing and

implementing watershed action plans. Disbursal of grant funds to agencies may be funneled through the lead administrative agency or paid directly to implementing agencies according to procedures established in the CCWF (see element WP-1), or under the 319 Management Program. Lead agencies for watershed plans are also encouraged to apply to the State Revolving Loan Fund and other state and federal funding sources for eligible projects, and to identify local sources of funding.

To ensure full participation in watershed planning, tribal governments are encouraged to evaluate their desired level of participation in watershed management committees. Tribal governments may submit grant applications to Ecology either simultaneously with lead agency applications or as an integrated part of lead agency applications. Tribal governments are also encouraged to coordinate with each other in the grant application process.

WP-5.2. Funding for Conservation Districts

Ongoing funding shall be provided by the Washington Conservation Commission to enable Puget Sound conservation districts to participate in planning and implementing watershed action plans. The Action Team recognizes the need for ongoing funding to maintain districts' basic administrative functions and also to carry out water quality programs. The Action Team expects that such funding will be made available, within the limitations of statewide responsibilities, from appropriations to the Conservation Commission for basic funding of conservation districts; basic funding and implementation of the *Puget Sound Management Plan*; and from appropriations to the Conservation Commission from the Centennial Clean Water Fund.

WP-5.3. Continued Funding for Washington Conservation Corps

Ecology shall request funds through its biennial budget process for the Washington Conservation Corps to allow it to continue to provide assistance in implementation of activities.

Financing for controlling nonpoint source pollution shall be coordinated with financing of other water quality improvements within the watershed. Establishment of utilities or other special-purpose districts such as on-site sewage maintenance districts, shellfish protection districts, and conservation assessments, shall be designed for maximum coordination and shall address implementation of

water quality improvement and protection activities, monitoring and education.

In instances where property owners have fenced along streams as part of a watershed action plan, the Dairy Waste Management Plan, or an approved farm management plan through the Natural Resource Conservation Service (NRCS) conservation district program, counties should consider granting open-space tax status pursuant to the Open Space Act (Chapter 84.34 RCW) to lands with restricted use resulting from fencing.

WP-5.4. Federal Funding

The Action Team, Ecology and the Environmental Protection Agency (EPA) shall actively seek ways to provide federal funding for the preparation and implementation of watershed action plans. Specifically, funding from Section 319 of the federal Clean Water Act shall be used to accelerate the implementation of local watershed action plans, as specified in the approved 319 Management Program. Priorities for 319 funding in the Puget Sound region shall be based on the *Puget Sound Management Plan* and biennial work plans. Other funding sources should include the federal CZARA of 1990, federal forest and job restoration initiatives and other federal watershed programs.

WP-6. Technical Assistance for Watershed Plans

Ecology shall coordinate among state agency watershed leads and shall provide watershed committees with clear direction as to which individuals or agencies to call directly for specific types of assistance. Ecology shall convene the state agency watershed leads annually to evaluate the effectiveness of this technical assistance program. Ecology shall ensure that technical information and assistance provided under this program is coordinated with other state and federal financial assistance programs, the boater education program (element MB-4), Ecology and Department of Health shellfish protection programs, Health's on-site sewage program, and the Department of Natural Resources' watershed analysis and forest practices prescriptions and the Department of Fish and Wildlife's habitat programs. Action Team members and watershed committees are encouraged to use resources provided through the Education and Public Involvement Program in conducting education associated with watershed action plans.

Action Team agencies are responsible for tracking development and implementation of watershed action plans in their areas of technical expertise, providing technical assistance to watershed committees throughout the watershed planning process, coordinating technical assistance within their agency and with other appropriate agencies, facilitating the statements of concurrence process for their agency, participating in plan review and serving as an agency contact person. Information on actions that should not be proposed in watershed action plans because of state or federal preemption should be made available to watershed management committees early in the planning process.

The Action Team shall seek ways to involve federal agencies in providing technical assistance to watershed planning and implementation activities. Federal agencies shall also work with local governments to resolve cases where federal programs may conflict with local goals in a watershed action plan (in accordance with Section 313 of the Clean Water Act).

WP-7. Program Management

WP-7.1. Annual Watershed "Report Cards"

To ensure continued local support, each lead agency, in cooperation with the appropriate watershed council, shall annually report on the progress made under completed watershed action plans. These "report cards" shall address information such as key accomplishments, barriers to plan implementation, staff and financial resources dedicated to carrying out the plan, results of monitoring data, and other topics relevant to plan implementation. Copies of watershed "report cards" are to be sent to the Action Team and Ecology.

WP-7.2. Monitoring

Ecology, along with Health for watersheds in which shellfish or drinking water is an issue, shall assist lead agencies in monitoring water quality as appropriate in each watershed with an approved watershed action plan. The purpose of the monitoring shall be to provide information for measuring the success of action plans in achieving water quality goals. Additionally, Ecology shall assist counties in establishing baseline monitoring programs for upcoming watersheds on the ranked list. These programs may include the use of data from citizen monitoring and other volunteer monitoring programs. Watershed monitoring shall be coordinated with the Puget Sound Ambient Monitoring Program (PSAMP), including use of the Puget Sound Estuary Program

Protocols and Guidelines. Counties shall, where applicable, use PSAMP protocols and transfer data to the PSAMP central database using data transfer formats developed under element M-4 of the Monitoring Program.

WP-7.3. Default Watersheds

Ecology shall work directly with local governments that fail to prepare watershed action plans to identify reasons for delay and to develop an appropriate strategy for addressing nonpoint concerns. Ecology shall use its regulatory authority under Chapter 90.48 RCW to require that water quality problems are corrected and, as a last resort, may prepare a watershed action plan. In the event of nonperformance or unsatisfactory completion of watershed action plans, Ecology may require repayment of grant funds disbursed to grantees.

WP-7.4. Program Management and Evaluation

Ecology shall be responsible for overall Nonpoint Program management and shall provide ongoing oversight of watershed action plan development and implementation. Management shall include program planning, intra- and interagency coordination, financial monitoring, public outreach, technical assistance to watershed committees and councils, information management, enforcement, and evaluation activities for all Nonpoint Source Pollution Program elements except on-site sewage and marinas and recreational boating elements for which Ecology is not lead. Ecology, in coordination with lead agencies, shall convene quarterly meetings of the local and tribal watershed planners to share information and experiences on the watershed action planning and implementation processes. The effectiveness of the nonpoint program, including the effectiveness of the watershed planning program and consideration of the need for more prescriptive standards, shall be evaluated by the Action Team as part of each revision of the Puget Sound Management Plan.

Target Date for 7.4: Ecology shall report progress on this element in its reports to the Action Team. Under the *1994 Puget Sound Management Plan*, counties were to have begun baseline monitoring in at least one new watershed by 1996.